



Office of the Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

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Formal Comments In Reference to  
Blanketing Interference Regulations  
RE: Reply Comments in MM Docket No. 96-62

Dear Secretary Caton,

Blanketing Interference occurs only because of one reason:  
The susceptible item does not reject the signals of nearby  
transmitters. There are dozens of transmitters in use in every  
city block, and throughout rural areas. Consumer equipment must  
be able to operate satisfactorily near a transmitter.

The fault lies with the manufacturer. Technology is readily  
available to prevent interference, but some manufacturers cut  
costs and do not consider protection because only a few will be  
faced with a problem.

The designer of the equipment should be responsible for  
correction. A transmitter operating within the rules is an  
innocent bystander, just as the public who bought the item.  
Neither the transmitter licensee nor the consumer should have the  
burden to correct the design flaws of a third party.

The interference susceptible product has a hidden flaw. The  
doctrine of "implied merchantability" states that the buyer of a  
product can expect the product to work properly for the purpose

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for which it was sold. Only a radio receiver should act like a radio.

Most manufacturers are cognizant of the problem, but some try to ignore it. I have personally witnessed an electrocardiograph manufacturer telling a doctor to move his office instead of accepting the responsibility of correcting a Blanketing Interference problem on their new EKG machine.

Less interference protection is translated into lower cost, and lower cost increases profits. The company gets away with a bigger profit if they are allowed to ignore the problem -- there is no motivation to protect the user.

The ability to reject signals of local transmitters is needed by all consumer equipment in today's world. It should be policy that warranty of merchantability extends to Blanketing Interference tolerance.

The manufacturer should be accountable for correction. Susceptibility is an inherent malfunction of a device, a hidden defect, caused by failure to follow good design.

Make it policy that the manufacturer of equipment is responsible for correction of blanketing interference.

Sincerely,



Deborah S. Proctor  
General Manager